Statement of Basis

Permit to Construct No. P-2015.0039

Project ID 61444

OrePac Building Products
Boise, Idaho

Facility ID 001-00302

Draft for Public Comment

Draft

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Permit Writer

The purpose of this Statement of Basis is to satisfy the requirements of
IDAPA 58.01.01.et seq, Rules for the Control of Air Pollution in Idaho, for issuing air permits.

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ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

AAC	acceptable ambient concentrations
AACC	acceptable ambient concentrations for carcinogens
acfm	actual cubic feet per minute
ASTM	American Society for Testing and Materials
BACT	Best Available Control Technology
BMP	best management practices
Btu	British thermal units
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CAS No.	Chemical Abstracts Service registry number
CBP	concrete batch plant
CEMS	continuous emission monitoring systems
cfm	cubic feet per minute
CFR	Code of Federal Regulations
CI	compression ignition
CMS	continuous monitoring systems
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	CO_2 equivalent emissions
COMS	continuous opacity monitoring systems
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
EL	screening emission levels
EPA	U.S. Environmental Protection Agency
FEC	Facility Emissions Cap
GHG	greenhouse gases
gph	gallons per hour
gpm	gallons per minute
gr	grains (1 lb = 7,000 grains)
HAP	hazardous air pollutants
HHV	higher heating value
HMA	hot mix asphalt
hp	horsepower
hr/yr	hours per consecutive 12 calendar month period
HVLP	High Volume Low Pressure
HVLPAA	High Volume Low Pressure Air Assist
ICE	internal combustion engines
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
iwg	inches of water gauge
km	kilometers
lb/hr	pounds per hour
lb/qtr	pound per quarter
m	meters
MACT	Maximum Achievable Control Technology
mg/dscm	milligrams per dry standard cubic meter
MMBtu	million British thermal units
MMscf	million standard cubic feet
NAAQS	National Ambient Air Quality Standard
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO_2	nitrogen dioxide

NO_x	nitrogen oxides
NSPS	New Source Performance Standards
O&M	operation and maintenance
OrePac	OrePac Building Products
O_2	oxygen
PAH	polyaromatic hydrocarbons
PC	permit condition
PCB	polychlorinated biphenyl
PERF	Portable Equipment Relocation Form
PM	particulate matter
$PM_{2.5}$	particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers
PM_{10}	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
POM	polycyclic organic matter
ppm	parts per million
ppmw	parts per million by weight
PSD	Prevention of Significant Deterioration
psig	pounds per square inch gauge
PTC	permit to construct
PTC/T2	permit to construct and Tier II operating permit
PTE	potential to emit
PW	process weight rate
RAP	recycled asphalt pavement
RFO	reprocessed fuel oil
RICE	reciprocating internal combustion engines
Rules	*Rules for the Control of Air Pollution in Idaho*
scf	standard cubic feet
SCL	significant contribution limits
SIP	State Implementation Plan
SM	synthetic minor
SM80	synthetic minor facility with emissions greater than or equal to 80% of a major source threshold
SO_2	sulfur dioxide
SO_x	sulfur oxides
T/day	tons per calendar day
T/hr	tons per hour
T/yr	tons per consecutive 12 calendar month period
T2	Tier II operating permit
TAP	toxic air pollutants
TEQ	toxicity equivalent
T-RACT	Toxic Air Pollutant Reasonably Available Control Technology
ULSD	ultra-low sulfur diesel
U.S.C.	United States Code
VOC	volatile organic compounds
yd^3	cubic yards
$\mu g/m^3$	micrograms per cubic meter

FACILITY INFORMATION

Description

OrePac Building Products (OrePac) proposes to obtain an Air Quality Permit to Construct (PTC) for its door, door-frame, and trim coating facility at 5500 South Federal Way in Boise, Idaho. It is currently operating as an exempt facility. Changes in coating formulations have prompted this application. Existing emission sources at the facility include four paint booths, one infrared curing oven, one natural gas-fired make-up air unit, three natural gas unit heaters, and three natural gas roof top heaters.

Permitting History

This is the initial PTC for an existing facility that was constructed in 1976 and purchased by OrePac in 1983. The portion of the facility where the paint booths are located was constructed in June 2013, thus there is no permitting history.

Application Scope

This permit is the initial PTC for this facility.

Application Chronology

November 18, 2014	DEQ received an application and an application fee.
December 1 to 16, 2014	DEQ provided an opportunity to request a public comment period on the application and proposed permitting action.
December 18, 2014	DEQ determined that the application was incomplete.
February 24, 2015	DEQ received supplemental information from the applicant.
March 25, 2015	DEQ determined that the application was incomplete.
March 26, 2015	DEQ received supplemental information from the applicant.
April 23, 2015	DEQ determined that the application was complete.
June 18, 2015	DEQ made available the draft permit and statement of basis for peer and regional office review.
June 23, 2015	DEQ made available the draft permit and statement of basis for applicant review.
June XX to XX, 2015	DEQ provided a public comment period on the proposed action.
Month Day, Year	DEQ received the permit processing fee.
Month Day, Year	DEQ issued the final permit and statement of basis.

TECHNICAL ANALYSIS

Table 1 EMISSIONS UNITS AND CONTROL EQUIPMENT INFORMATION

Source ID No.	Sources	Control Equipment	Emission Point ID No.
MAU1	**Make-Up Air Unit:** Manufacturer: Weather-Rite Model: MAU TT-230-VTL Manufacture Date: April 2013 Heat input rating: 5.127 MMBtu/hr Fuel: Natural Gas	None Restriction on Fuel Type	None
RTU1	**Roof Top Unit:** Manufacturer: Carrier Model: 48TFE005-A-511 Manufacture Date: June 1978 Heat input rating: 0.115 MMBtu/hr Fuel: Natural Gas	None Restriction on Fuel Type	Exit height: 12.1ft (3.70 m) Exit diameter: 0.003ft (0.001 m) Exit flow rate: 20.3 acfm Exit temperature: 140°F (60 ºC)
RTU2	**Roof Top Unit:** Manufacturer: Carrier Model: 48TFE005-A-511 Manufacture Date: June 1976 Heat input rating: 0.074 MMBtu/hr Fuel: Natural Gas	None Restriction on Fuel Type	Exit height: 12.1 ft (3.70 m) Exit diameter: 0.003ft (0.001 m) Exit flow rate: 13.1 acfm Exit temperature: 140°F (60 ºC)
RTU3	**Roof Top Unit:** Manufacturer: Goodman Model: GPG13 480901AB Manufacture Date: June 1976 Heat input rating: 0.092 MMBtu/hr Fuel: Natural Gas	None Restriction on Fuel Type	Exit height: 12.1 ft (3.70 m) Exit diameter: 0.003ft (0.001 m) Exit flow rate: 16.2 acfm Exit temperature: 140°F (60 ºC)
UH1	**Unit Heater:** Manufacturer: Reznor Model: VR 75 Manufacture Date: June 1983 Heat input rating: 0.075 MMBtu/hr Fuel: Natural Gas	None Restriction on Fuel Type	Exit height: 30.2 ft (9.22 m) Exit diameter: 0.328 ft (0.10 m) Exit flow rate: 13.2 acfm Exit temperature: 140°F (60 ºC)
UH2	**Unit Heater:** Manufacturer: Reznor Model: VR 75 Manufacture Date: June 1983 Heat input rating: 0.075 MMBtu/hr **Fuel: Natural Gas**	None Restriction on Fuel Type	Exit height: 31.0 ft (9.45 m) Exit diameter: 0.328 ft (0.10 m) Exit flow rate: 13.2 acfm Exit temperature: 140°F (60 ºC)
UH3	**Unit Heater:** Manufacturer: Reznor Model: VR 75 Manufacture Date: June 1983 Heat input rating: 0.075 MMBtu/hr Fuel: Natural Gas	None Restriction on Fuel Type	Exit height: 30.6 ft (9.35 m) Exit diameter: 0.328 ft (0.10 m) Exit flow rate: 13.2 acfm Exit temperature: 140°F (60 ºC)

Table 1 EMISSIONS UNITS AND CONTROL EQUIPMENT INFORMATION (continued)

Source ID No.	Sources	Control Equipment	Emission Point ID No.
PB1	**Spray Gun:** Manufacturer: AirPro Model: 1.4 Type: HVLP Transfer Efficiency: 60%	**Paint Booth: PB1** Name/Type: Custom Open Face Paint Booth Construction Date: March 1, 2014 Filter, Control Efficiency: 99.43% or greater Limit on the Type and Volume of Material Usage	Exit height: 30.3 ft (9.25 m) Exit diameter: 2.0 ft (0.61 m) Exit flow rate: 8,750 acfm Exit temperature: 72.05°F (22.25ºC)
	Spray Gun: Manufacturer: AirPro Model: 3 Type: HVLP Transfer Efficiency: 60%		
PB2	Automated Spray Guns HVLP or Higher	**Paint Booth: PB2** Name/Type: Custom Partially Enclosed Linear Paint Booth Construction Date: March 1, 2014 Filter, Control Efficiency: 99.43% or greater Limit on the Type and Volume of Material Usage	Exit height: 31.9 ft (9.75 m) Exit diameter: 1.2 ft (0.36 m) Exit flow rate: 2000 acfm Exit temperature: 72.05°F (22.25ºC)
PB3	**Spray Gun:** Manufacturer: Kremlin-Rexson Model: X-Cite Type: HVLPAA Transfer Efficiency: 84%	**Paint Booths: PB3 and PB4** Manufacturer: Unibilt Name/Type: Conveyer Linear Open Face Paint Booths Construction Date: March 1, 2014 Filter, Control Efficiency: 99.43% or greater Limit on the Type and Volume of Material Usage	Exit height: 29.8 ft (9.08 m) Exit diameter: 0.328 ft (0.10 m) Exit flow rate: 10,500 acfm Exit temperature: 72.05°F (22.25ºC)
PB4	**Spray Gun:** Manufacturer: Anest Iwata Model: LPH-200 Type: HVLP Transfer Efficiency: 60%		Exit height: 29.0 ft (8.85 m) Exit diameter: 0.328 ft (0.10 m) Exit flow rate: 10,500 acfm Exit temperature: 72.05°F (22.25ºC)
IO1	**Infrared Curing Oven:** Manufacturer: Unibilt Power: Electricity	None	Exit height: 27.5 ft (8.39 m) Exit diameter: 1.345 ft (0.41 m) Exit flow rate: 3,800 acfm Exit temperature: 120°F (48.89 ºC)

Emissions Inventories

Potential to Emit

IDAPA 58.01.01 defines Potential to Emit as the maximum capacity of a facility or stationary source to emit an air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored or processed, shall be treated as part of its design if the limitation or the effect it would have on emissions is state or federally enforceable. Secondary emissions do not count in determining the potential to emit of a facility or stationary source.

Using this definition of Potential to Emit an emission inventory was developed for the door, door-frame, and trim coating operation which consists of one make-up unit, three roof-top units, three unit heaters, four paint booths, and one infrared drying oven. Emissions estimates of criteria pollutant, GHG, HAP PTE were based on emission factors from AP-42, operation of 8,760 hours per year, and process information specific to the facility for this proposed project.

Uncontrolled Potential to Emit

Using the definition of Potential to Emit, uncontrolled Potential to Emit is then defined as the maximum capacity of a facility or stationary source to emit an air pollutant under its physical and operational design. To determine facility classification only, any physical or operational limitation on the capacity of the facility or source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored or processed, shall **not** be treated as part of its design **since,** in the context of uncontrolled PTE, the limitation or the effect it would have on emissions **is not** state or federally enforceable.

The uncontrolled Potential to Emit is used to determine if a facility is a "Synthetic Minor" source of emissions. Synthetic Minor sources are facilities that have an uncontrolled Potential to Emit for regulated air pollutants or HAP above the applicable Major Source threshold without permit limits.

The following table presents the uncontrolled Potential to Emit for regulated air pollutants as submitted by the Applicant and verified by DEQ staff. See Appendix A for a detailed presentation of the calculations and the assumptions used to determine emissions for each emissions unit. For this door, door-frame, and trim coating facility, for one Make-up Air Unit, three Roof-Top Units, and the three unit heaters, the uncontrolled Potential to Emit is based upon a worst-case (maximum operation) for operation of the facility of 8,760 hr/yr. For the paint room, the uncontrolled Potential to Emit is based upon a worst-case (maximum operation) for operation of the facility of 8,760 hr/yr. In addition, the paint booth filter control efficiency is 99.43%. With a control efficiency of 99.43 for the filters of the paint booths, PM is reduced from an uncontrolled value of 19.82 T/yr to a controlled value of 0.11 T/yr.

Table 2 UNCONTROLLED POTENTIAL TO EMIT FOR REGULATED AIR POLLUTANTS

	$PM_{2.5}$	**PM_{10}**	**SO_2**	**NOx**	**CO**	**VOC**	**CO_2e**
Emissions Unit	T/yr	T/yr	T/yr	T/yr	T/yr	T/yr	T/yr
Point Sources							
MAU1	0.17	0.17	0.013	2.20	1.85	0.12	2,627
RTU and UH	0.02	0.02	0.001	0.20	0.09	0.01	260
Paint Rooms	19.82	19.82	0	0.00	0.00	94.36	---
Total, Point Sources	**20.01**	**20.01**	**0.014**	**2.40**	**1.94**	**94.49**	**2,887**

The following table presents the uncontrolled Potential to Emit for HAP pollutants as submitted by the Applicant and verified by DEQ staff. See Appendix A for a detailed presentation of the calculations and the assumptions used to determine emissions for each emissions unit. For this door, door-frame, and trim coating facility, for the Make-up Air Unit, the 3 Roof-Top Units, and the 3 unit heaters, the uncontrolled Potential to Emit is based upon a worst-case (maximum operation) for operation of the facility of 8,760 hr/yr. For the paint room, the uncontrolled Potential to Emit is based upon a worst-case (maximum operation) for operation of the facility of 8,760 hr/yr.

Table 3 UNCONTROLLED POTENTIAL TO EMIT FOR HAZARDOUS AIR POLLUTANTS

Hazardous Air Pollutants	PTE (T/yr)
Arsenic	4.8E-06
Benzene	5.1E-05
Beryllium	2.9E-07
Cadmium	2.7E-05
Chromium	1.2E-03
Cobalt	2.0E-06
Cobalt 2-Ethylhexanoate	5.6E-03
Cumene	1.4E-02
Dichlorobenzene	2.9E-05
Ethylbenzene	5.4E-01
Formaldehyde	1.8E-03
Hexane	0.04
Lead	1.2E-05
Manganese	9.2E-06
Mercury	6.3E-06
Methyl Isobutyl Ketone	0.17
Methyl Methacrylate	0.51
o-Cresol	0.007
Naphalene	1.5E-05
Nickel	5.1E-05
Polycyclic Organic Matter	2.8E-07
Selenium	5.8E-07
Toluene	7.7
Triethylamine	0.04
Xylene	3.1
Total	**12.1**

Pre-Project Potential to Emit

Pre-project Potential to Emit is used to establish the change in emissions at a facility as a result of this project.

This is an existing facility. However, since this is the first time the facility is receiving a permit, pre-project emissions are set to zero for all criteria pollutants.

Post Project Potential to Emit

Post project Potential to Emit is used to establish the change in emissions at a facility and to determine the facility's classification as a result of this project. Post project Potential to Emit includes all permit limits resulting from this project.

The following table presents the post project Potential to Emit for criteria and GHG pollutants from all emissions units at the facility as determined by DEQ staff. See Appendix A for a detailed presentation of the calculations of these emissions for each emissions unit.

Table 4 POST PROJECT POTENTIAL TO EMIT FOR REGULATED AIR POLLUTANT

	$PM_{2.5}$	**PM_{10}**	**SO_2**	**NOx**	**CO**	**VOC**	**CO_2e**
Source	T/yr	T/yr	T/yr	T/yr	T/yr	T/yr	T/yr
Point Sources							
MAU1	0.17	0.17	0.013	2.20	1.85	0.121	2,627
RTU and UH	0.02	0.02	0.001	0.20	0.09	0.01	260
Paint Room	0.12	0.12	0	0.00	0.00	94.36	0.00
Total, Point Sources	**0.30**	**0.30**	**0.014**	**2.40**	**1.94**	**94.49**	**2,887**

a) Controlled average emission rate in tons per year is an annual average, based on the proposed annual operating schedule and annual limits.

Change in Potential to Emit

The change in facility-wide potential to emit is used to determine if a public comment period may be required and to determine the processing fee per IDAPA 58.01.01.225. The following table presents the facility-wide change in the potential to emit for criteria pollutants.

Table 5 CHANGES IN POTENTIAL TO EMIT FOR REGULATED AIR POLLUTANTS

	$PM_{2.5}$	**PM_{10}**	**SO_2**	**NOx**	**CO**	**VOC**	**CO_2e**
Source	T/yr	T/yr	T/yr	T/yr	T/yr	T/yr	T/yr
Point Sources							
Pre-Project Potential to Emit	0.00	0.00	0.00	0.00	0.00	0.00	0
Post-Project Potential to Emit	**0.30**	**0.30**	**0.014**	**2.40**	**1.94**	**94.49**	**2,887**
Changes in Potential to Emit	**0.30**	**0.30**	**0.014**	**2.40**	**1.94**	**94.49**	**2,887**

Non-Carcinogenic TAP Emissions

A summary of the estimated PTE for emissions increase of non-carcinogenic toxic air pollutants (TAP) is provided in the following table.

Table 6 PRE- AND POST PROJECT POTENTIAL TO EMIT FOR NON-CARCINOGENIC TOXIC AIR POLLUTANTS

Non-Carcinogenic Toxic Air Pollutants	Pre-Project 24-hour Average Emissions Rates for Units at the Facility (lb/hr)	Post Project 24-hour Average Emissions Rates for Units at the Facility (lb/hr)	Change in 24-hour Average Emissions Rates for Units at the Facility (lb/hr)	Non-Carcinogenic Screening Emission Level (lb/hr)	Exceeds Screening Level? (Y/N)
Ethanol	0	0.111	0.111	125	No
2-Propanol	0	0.063	0.063	65.3	No
Acetone	0	0.161	0.161	119	No
1-Butanol	0	0.079	0.079	10	No
2-Methyl-1-propanol	0	0.122	0.122	10	No
MEK	0	5.466	5.466	39.3	No
Methyl Methacrylate	0	0.118	0.118	27.3	No
o-Cresol	0	0.002	0.002	1.47	No
Cumene	0	0.0032	0.0032	16.300	No
Ethylbenzene	0	0.124	0.124	29	No
1-Methoxy-2-propanol	0	3.562	3.562	24	No
Methyl Isobutyl Ketone	0	0.039	0.039	13.7	No
Isopropyl Acetate	0	2.233	2.233	69.3	No
1-Methoxy-2-Propanol Acetate	0	0.493	0.493	24	No
Toluene	0	1.763	1.763	25	No
Cyclohexanone	0	4.917	4.917	6.67	No
n-Propyl Acetate	0	0.006	0.006	56	No
Pentane	0	0.014	0.014	118	No
Methyl n-Amyl Ketone	0	4.114	4.114	15.7	No
Hexane	0	0.010	0.010	12	No
2-Butoxyethanol	0	0.198	0.198	8	No
Triethylamine	0	0.009	0.009	0.27	No
Diacetone Alcohol	0	0.1480	0.1480	16	No
n-Butyl Acetate	0	5.793	5.793	47.3	No
Amyl Acetate	0	0.111	0.111	35.3	No
Xylene	0	0.697	0.697	29	No
V.M. & P. Naphtha	0	0.325	0.325	91.3	No

None of the PTEs for non-carcinogenic TAP were exceeded as a result of this project. Therefore, modeling is not required for any non-carcinogenic TAP because none of the 24-hour average non-carcinogenic screening ELs identified in IDAPA 58.01.01.585 were exceeded.

Carcinogenic TAP Emissions

A summary of the estimated PTE for emissions increase of carcinogenic toxic air pollutants (TAP) is provided in the following table.

Table 7 PRE- AND POST PROJECT POTENTIAL TO EMIT FOR CARCINOGENIC TOXIC AIR POLLUTANTS

Carcinogenic Toxic Air Pollutants	Pre-Project Annual Average Emissions Rates for Units at the Facility (lb/hr)	Post Project Annual Average Emissions Rates for Units at the Facility (lb/hr)	Change in Annual Average Emissions Rates for Units at the Facility (lb/hr)	Carcinogenic Screening Emission Level (lb/hr)	Exceeds Screening Level? (Y/N)
Formaldehyde	0	**2.0E-03**	**2.0E-03**	**5.1E-04**	**Yes**
Benzo(a)pyrene	0	6.6E-09	6.6E-09	2.0E-06	No
3-Methylchloranthene	0	9.9E-09	9.9E-09	2.5E-06	No
Benzene	0	1.2E-05	1.2E-05	8.0E-04	No
Arsenic	0	1.1E-06	1.1E-06	1.5E-06	No
Beryllium	0	6.6E-08	6.6E-08	2.8E-05	No
Cadmium	0	**6.1E-06**	**6.1E-06**	**3.7E-06**	**Yes**
Nickel	0	1.2E-05	1.2E-05	2.7E-05	No
Polyaromatic Hydrocarbon (Max)	0	3.7E-06	3.7E -06	9.1E-05	No
Polycyclic Organics; 7-PAH Group	0	6.3E-08	6.3E-08	2.0E-06	No

a) Polycyclic Organic Matter (POM) is considered as one TAP comprised of: benzo(a)anthracene, benzo(b)fluoranthene, benzo(k)fluoranthene, dibenzo(a,h)anthracene, chrysene, indeno(1,2,3-cd)pyrene, benzo(a)pyrene. The total is compared to benzo(a)pyrene.

Some of the PTEs for carcinogenic TAP were exceeded as a result of this project. Therefore, modeling is required for Formaldehyde and Cadmium, because the annual average carcinogenic screening ELs identified in IDAPA 58.01.01.586 were exceeded.

Post Project HAP Emissions

The following table presents the post project potential to emit for HAP pollutants from all emissions units at the facility as submitted by the Applicant and verified by DEQ staff. See Appendix A for a detailed presentation of the calculations of these emissions for each emissions unit.

Table 8 POTENTIAL TO EMIT FOR HAZARDOUS AIR POLLUTANTS

Hazardous Air Pollutants	PTE (T/yr)
Arsenic	4.8E-06
Benzene	5.1E-05
Beryllium	2.9E-07
Cadmium	2.7E-05
Chromium	1.2E-03
Cobalt	2.0E-06
Cobalt 2-Ethylhexanoate	5.6E-03
Cumene	1.4E-02
Dichlorobenzene	2.9E-05
Ethylbenzene	5.4E-01
Formaldehyde	1.8E-03
Hexane	0.04
Lead	1.2E-05
Manganese	9.2E-06
Mercury	6.3E-06
Methyl Isobutyl Ketone	0.17
Methyl Methacrylate	0.51
o-Cresol	0.007
Naphalene	1.5E-05
Nickel	5.1E-05
Polycyclic Organic Matter	2.8E-07
Selenium	5.8E-07
Toluene	7.7
Triethylamine	0.04
Xylene	3.1
Total	**12.1**

Ambient Air Quality Impact Analyses

As presented in the Modeling Memo in Appendix B, the estimated emission rates of $PM_{2.5}$, PM_{10}, SO_2, NO_x, CO, VOCs, TAPs, and HAPs from this project were below applicable screening emission levels (EL), with the exception of Cadmium and Formaldehyde and published DEQ modeling thresholds established in IDAPA 58.01.01.585-586 and in the State of Idaho Air Quality Modeling Guideline[1]. Refer to the Emissions Inventories section for additional information concerning the emission inventories.

The applicant has demonstrated pre-construction compliance to DEQ's satisfaction that emissions from this facility will not cause or significantly contribute to a violation of any ambient air quality standard. The applicant has also demonstrated pre-construction compliance to DEQ's satisfaction that the emissions increase due to this permitting action will not exceed any acceptable ambient concentration (AAC) or acceptable ambient concentration for carcinogens (AACC) for toxic air pollutants (TAP). A summary of the Ambient Air Impact Analysis for TAP is provided in Appendix A.

[1] Criteria pollutant thresholds in Table 2, State of Idaho Guideline for Performing Air Quality Impact Analyses, Doc ID AQ-011, September 2013.

An ambient air quality impact analyses document has been crafted by DEQ based on a review of the modeling analysis submitted in the application. That document is part of the final permit package for this permitting action (see Appendix B).

REGULATORY ANALYSIS

Attainment Designation (40 CFR 81.313)

The facility is located in Ada County, which is designated as attainment or unclassifiable for $PM_{2.5}$, PM_{10}, SO_2, NO_2, CO, and Ozone (VOCs). Refer to 40 CFR 81.313 for additional information.

Facility Classification

The AIRS/AFS facility classification codes are as follows:

For THAPs (Total Hazardous Air Pollutants) Only:

A = Use when any one HAP has actual or potential emissions ≥ 10 T/yr or if the aggregate of all HAPS (Total HAPs) has actual or potential emissions ≥ 25 T/yr.

SM80 = Use if a synthetic minor (potential emissions fall below applicable major source thresholds if and only if the source complies with federally enforceable limitations) and the permit sets limits ≥ 8 T/yr of a single HAP or ≥ 20 T/yr of THAP.

SM = Use if a synthetic minor (potential emissions fall below applicable major source thresholds if and only if the source complies with federally enforceable limitations) and the potential HAP emissions are limited to < 8 T/yr of a single HAP and/or < 20 T/yr of THAP.

B = Use when the potential to emit without permit restrictions is below the 10 and 25 T/yr major source threshold

UNK = Class is unknown

For All Other Pollutants:

A = Actual or potential emissions of a pollutant are ≥ 100 T/yr.

SM80 = Use if a synthetic minor for the applicable pollutant (potential emissions fall below 100 T/yr if and only if the source complies with federally enforceable limitations) and potential emissions of the pollutant are ≥ 80 T/yr.

SM = Use if a synthetic minor for the applicable pollutant (potential emissions fall below 100 T/yr if and only if the source complies with federally enforceable limitations) and potential emissions of the pollutant are < 80 T/yr.

B = Actual and potential emissions are < 100 T/yr without permit restrictions.

UNK = Class is unknown.

Table 9 REGULATED AIR POLLUTANT FACILITY CLASSIFICATION

Pollutant	Uncontrolled PTE (T/yr)	Permitted PTE (T/yr)	Major Source Thresholds (T/yr)	AIRS/AFS Classification
PM	20.01	20.01	**100**	B
PM_{10}	20.01	20.01	**100**	B
$PM_{2.5}$	20.01	20.01	**100**	B
SO_2	0.014	0.014	**100**	B
NO_X	2.40	2.40	**100**	B
CO	1.94	1.94	**100**	B
VOC	94.49	94.49	**100**	B
HAP (single)	7.7	7.7	**10**	B
HAP (Total)	12.1	12.1	**25**	B

Permit to Construct (IDAPA 58.01.01.201)

IDAPA 58.01.01.201..... Permit to Construct Required

The permittee has requested that a PTC be issued to the facility for the proposed new emissions source. Therefore, a permit to construct is required to be issued in accordance with IDAPA 58.01.01.220. This permitting action was processed in accordance with the procedures of IDAPA 58.01.01.200-228.

Tier II Operating Permit (IDAPA 58.01.01.401)

IDAPA 58.01.01.401..... Tier II Operating Permit

The application was submitted for a permit to construct (refer to the Permit to Construct section), and an optional Tier II operating permit has not been requested. Therefore, the procedures of IDAPA 58.01.01.400–410 were not applicable to this permitting action.

Visible Emissions (IDAPA 58.01.01.625)

IDAPA 58.01.01.625..... Visible Emissions

The sources of PM_{10} emissions at this facility are subject to the State of Idaho visible emissions standard of 20% opacity. This requirement is assured by Permit Condition 2.4.

Title V Classification (IDAPA 58.01.01.300, 40 CFR Part 70)

IDAPA 58.01.01.301..... Requirement to Obtain Tier I Operating Permit

Post project facility-wide emissions from this facility do not have a potential to emit greater than 100 tons per year for ($PM_{2.5}$, PM_{10}, SO_2, NO_X, CO, and VOCs) or 10 tons per year for any one HAP or 25 tons per year for all HAPs combined as demonstrated previously in the Emissions Inventories Section of this analysis. Therefore, the facility is not a Tier I source in accordance with IDAPA 58.01.01.006 and the requirements of IDAPA 58.01.01.301 do not apply.

PSD Classification (40 CFR 52.21)

40 CFR 52.21 ..... Prevention of Significant Deterioration of Air Quality

The facility is not a major stationary source as defined in 40 CFR 52.21(b)(1), nor is it undergoing any physical change at a stationary source not otherwise qualifying under paragraph 40 CFR 52.21(b)(1) as a major stationary source, that would constitute a major stationary source by itself as defined in 40 CFR 52. Therefore in accordance with 40 CFR 52.21(a)(2), PSD requirements are not applicable to this permitting action. The facility is/is not a designated facility as defined in 40 CFR 52.21(b)(1)(i)(a), and does not have facility-wide emissions of any criteria pollutant that exceed 250 T/yr.

NSPS Applicability (40 CFR 60)

Because the facility has a wood and wood-frame coating operation, NSPS requirements may apply to this facility:

40 CFR 60, Subpart EE..... Standards of Performance for Surface Coating of Metal Furniture

§ 60.310..... Applicability and designation of affected facility.

(a) The affected facility to which the provisions of this subpart apply is each metal furniture surface coating operation in which organic coatings are applied.

This facility does not surface coat metal furniture. Therefore, it is not subject to 40 CFR 60, Subpart EE.

40 CFR 60, Subpart SS ..... Standards of Performance for Industrial Surface Coating: Large Appliances

§ 60.450 ..... Applicability and designation of affected facility.

(a) The provisions of this subpart apply to each surface coating operation in a large appliance surface coating line.

This facility does not surface coat larger appliances. Therefore, it is not subject to 40 CFR 60, Subpart SS.

Therefore, this facility is not subject to any NSPS requirements.

NESHAP Applicability (40 CFR 61)

This facility is not subject to any NESHAP requirements.

MACT Applicability (40 CFR 63)

Because the facility has a wood and wood-frame coating operation, MACT requirements may apply to this facility:

40 CFR 63, Subpart JJ ..... National Emission Standard for Wood Furniture Manufacturing Operations

§ 63.800 ..... Applicability

(a) The affected source to which this subpart applies is each facility that is engaged, either in part or in whole, in the manufacture of wood furniture or wood furniture components and that is located at a plant site that is a major source as defined in 40 CFR part 63, subpart A, §63.2.

This facility does not manufacture wood furniture or wood furniture components. Therefore, it is not subject to 40 CFR 63, Subpart JJ.

40 CFR 63, Subpart MMMM ..... National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products

§ 63.3881 ..... Am I subject to this subpart?

(a) Miscellaneous metal parts and products include, but are not limited to, metal components of the following types of products as well as the products themselves: motor vehicle parts and accessories, bicycles and sporting goods, recreational vehicles, extruded aluminum structural components, railroad cars, heavy duty trucks, medical equipment, lawn and garden equipment, electronic equipment, magnet wire, steel drums, industrial machinery, metal pipes, and numerous other industrial, household, and consumer products.

(b) You are subject to this subpart if you own or operate a new, reconstructed, or existing affected source, as defined in §63.3882, that uses 946 liters (250 gallons (gal)) per year, or more, of coatings that contain hazardous air pollutants (HAP) in the surface coating of miscellaneous metal parts and products defined in paragraph (a) of this section; and that is a major source, is located at a major source, or is part of a major source of emissions of HAP…

This facility does not manufacture miscellaneous metal parts and is not a major source; therefore, it is not subject to 40 CFR 63, Subpart MMMM.

40 CFR 63, Subpart NNNN ..... National Emission Standard for Hazardous Air Pollutants: Surface Coating of Large Appliances

§ 63.4081 ..... Am I subject to this subpart?

(a) You are subject to this subpart if you own or operate a facility that applies coatings to large appliance parts or products, and is a major source,

This facility does not manufacture large appliance parts or products and is not a major source; therefore, it is not subject to 40 CFR 63, Subpart NNNN.

40 CFR 63, Subpart QQQQ ..... National Emission Standards for Hazardous Air Pollutants: Surface Coating of Wood Building Products

§ 63.4681 ..... Am I subject to this subpart?

(b) You are subject to this subpart if you own or operate a new, reconstructed, or existing affected source, as defined in §63.4682, that uses 4,170 liters (1,100 gallons) per year, or more, of coatings in the source category defined in paragraph (a) of this section and that is a major source, is located at a major source, or is part of a major source of emissions of hazardous air pollutants (HAP).

As presented previously in Table 9, this facility is not a major source; therefore, it is not subject to 40 CFR 63, Subpart QQQQ.

40 CFR 63, Subpart RRRR ..... National Emission Standard for Hazardous Air Pollutants: Surface Coating of Metal Furniture

§ 63.4881 ..... Am I subject to this subpart?

(a) Except as provided in paragraph (c) of this section, the source category to which this subpart applies is surface coating of metal furniture.

(b) You are subject to this subpart if you own or operate a new, reconstructed, or existing affected source as defined in §63.4882, in the source category defined in paragraph (a) of this section, and that is a major source, is located at a major source, or is part of a major source of emissions of hazardous air pollutants (HAP). A major source of HAP emissions is any stationary source or group of stationary sources located within a contiguous area and under common control that emits or has the potential to emit any single HAP at a rate of 9.07 megagrams (Mg) (10 tons) or more per year or any combination of HAP at a rate of 22.68 Mg (25 tons) or more per year.

This facility does not coat metal furniture and is not a major source; therefore, it is not subject to 40 CFR 63, Subpart RRRR.

40 CFR 63, Subpart HHHHHH ..... National Emission Standards for Hazardous: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources.

§ 63.11170 ..... Am I subject to this subpart?

(a) You are subject to this subpart if you operate an area source of HAP as defined in paragraph (b) of this section, including sources that are part of a tribal, local, State, or Federal facility and you perform one or more of the activities in paragraphs (a)(1) through (3) of this section:

(1) Perform paint stripping using MeCl for the removal of dried paint (including, but not limited to, paint, enamel, varnish, shellac, and lacquer) from wood, metal, plastic, and other substrates.

(2) Perform spray application of coatings, as defined in §63.11180, to motor vehicles and mobile equipment including operations that are located in stationary structures at fixed locations, and mobile repair and refinishing operations that travel to the customer's location, except spray coating applications that meet the definition of facility maintenance in §63.11180. However, if you are the owner or operator of a motor vehicle or mobile equipment surface coating operation, you may petition the Administrator for an exemption from this subpart if you can demonstrate, to the satisfaction of the Administrator, that you spray apply no coatings that contain the target HAP, as defined in §63.11180. Petitions must include a description of the coatings that you spray apply and your certification that you do not spray apply any coatings containing the target HAP. If circumstances change such that you intend to spray apply coatings containing the target HAP, you must submit the initial notification required by 63.11175 and comply with the requirements of this subpart.

(3) Perform spray application of coatings that contain the target HAP, as defined in §63.11180, to a plastic and/or metal substrate on a part or product, except spray coating applications that meet the definition of facility maintenance or space vehicle in §63.11180.

This facility does not use MeCl to strip paint, they do not coat motor vehicles or motor equipment, and they do not coat metal or plastic parts with target HAP-containing coatings; therefore, it is not subject to 40 CFR 63, Subpart HHHHHH.

40 CFR 63, Subpart XXXXXX..... National Emission Standard for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories

§ 63.11514..... Am I subject to this subpart?

(a) You are subject to this subpart if you own or operate an area source that is primarily engaged in the operations in one of the nine source categories listed in paragraphs (a)(1) through (9) of this section. Descriptions of these source categories are shown in Table 1 of this subpart. "Primarily engaged" is defined in §63.11522, "What definitions apply to this subpart?"

(1) Electrical and Electronic Equipment Finishing Operations;

(2) Fabricated Metal Products;

(3) Fabricated Plate Work (Boiler Shops);

(4) Fabricated Structural Metal Manufacturing;

(5) Heating Equipment, except Electric;

(6) Industrial Machinery and Equipment Finishing Operations;

(7) Iron and Steel Forging;

(8) Primary Metal Products Manufacturing; and

(9) Valves and Pipe Fittings.

This facility does not manufacture metal doors, door-frames, or trim; therefore, it is not subject to 40 CFR 63, Subpart XXXXXX.

Therefore the facility is not subject to any MACT standards in 40 CFR Part 63.

Permit Conditions Review

This section describes the permit conditions for this initial permit or only those permit conditions that have been added, revised, modified or deleted as a result of this permitting action.

Section 2 Permit to Construct Conditions

This section describes the permit conditions for this initial permit.

Initial Permit Condition 2.1 provides a process description of the facility.

Initial Permit Condition 2.2 provides a description of the emission control devices used at the facility.

Initial Permit Condition 2.3 establishes hourly and annual emissions limits for PM_{10} and VOC emissions from the door, door–frame, and trim coating operation.

Initial Permit Condition 2.4 establishes a 20% opacity limit for the paint booth stacks, vents, or functionally equivalent openings associated with the door, door-frame, and trim coating operation.

Initial Permit Condition 2.5 establishes that the permittee shall not allow, suffer, cause, or permit the emission of odorous gasses, liquids, or solids to the atmosphere in such quantities as to cause air pollution.

Initial Permit Condition 2.6 establishes that only natural gas is allowed to be used as fuel.

Initial Permit Condition 2.7 establishes the coating material use limits. Listed are specific coatings which the applicant demonstrated to show compliance with the TAP standards. Daily and annual (any consecutive rolling 12-month period) usage limits are included which match the amounts the applicant has proposed.

Initial Permit Condition 2.8 allows the permittee to use coatings and solvents that are not specifically listed in the permit provided that either the substance qualifies for exemption in accordance with Section 220-223, or the uses of such substance is limited to amounts that would result in emissions that are equal or less than the screening emission levels listed in 585 & 586.

Prior to using any coating or solvent that is not specifically listed in the permit, the permittee shall either document that such usage qualifies and complies with the exemptions at Section 220-223 or the permittee shall calculate the amount of the coating or solvent that may be used. In order to calculate the amount of coating or solvent that may be used the permittee shall use the provided equations. The equations in the permit are derived below.

For volatile TAPs:

Calculating TAP emission rate:
TAP (lb/hr) = usage rate (gal/hr) x density (lb/gal) x TAP%/100

Determining the amount of coating or solvent that may be used:
Substitute the EL (lb/hr) listed in Section 585 or 586 for TAP (lb/hr); then the equation becomes
EL (lb/hr) = usage rate (gal/hr) x density (lb/gal) x TAP%/100; then rearrange the equation
usage rate (gal/hr) = EL(lb/hr)/(TAP%/100 x density (lb/gal); then determine daily usage
usage rate (gal/day) = [EL(lb/hr)/(TAP%/100 x density (lb/gal)] x 24 hr/day

For particulate TAPs:

Calculating TAP emission rate:
TAP (lb/hr) = usage rate (gal/hr) x density (lb/gal) x TAP%/100 x (1- Trans. Eff./100)(1-Removal Eff./100)
TAP (lb/hr) = usage rate (gal/hr) x density (lb/gal) x TAP%/100 x (1- 60/100)(1-99.2/100)
TAP (lb/hr) = usage rate (gal/hr) x density (lb/gal) x TAP%/100 x 0.40x 0.008
TAP (lb/hr) = usage rate (gal/hr) x density (lb/gal) x TAP%/100 x 0.0032

Determining the amount of coating or solvent that may be used:
Substitute the EL (lb/hr) listed in Section 585 or 586 for TAP (lb/hr); then the equation becomes
EL (lb/hr) = usage rate (gal/hr) x density (lb/gal) x TAP%/100 x 0.0032, the rearrange the equation
usage rate (gal/hr) = EL (lb/hr)/ (TAP%/100 x density (lb/gal) x 0.0032); then determine daily usage
usage rate (gal/day) =[EL (lb/hr)/ (TAP%/100 x density (lb/gal) x 0.0032)] x 24 hr/day usage rate (gal/day) =[EL (lb/hr)/ (TAP%/100 x density (lb/gal)] x 7,500.

Initial Permit Condition 2.9 (previously 2.8) describes the spray gun and spray booth system.

Initial Permit Condition 2.10 (previously 2.9) establishes a reporting requirement for any odor complaints.

Initial Permit Condition 2.11 (previously 2.10) establishes a requirement to keep material purchase records and material data safety sheets.

Initial Permit Condition 2.12 (previously 2.11) establishes a requirement to keep a record of coating material usage.

Section 3 Permit to Construct Conditions

Initial Permit Condition 3.1

The duty to comply general compliance provision requires that the permittee comply with all of the permit terms and conditions pursuant to Idaho Code §39-101.

Initial Permit Condition 3.2

The maintenance and operation general compliance provision requires that the permittee maintain and operate all treatment and control facilities at the facility in accordance with IDAPA 58.01.01.211.

Initial Permit Condition 3.3

The obligation to comply general compliance provision specifies that no permit condition is intended to relieve or exempt the permittee from compliance with applicable state and federal requirements, in accordance with IDAPA 58.01.01.212.01.

Initial Permit Condition 3.4

The inspection and entry provision requires that the permittee allow DEQ inspection and entry pursuant to Idaho Code §39-108.

Initial Permit Condition 3.5

The permit expiration construction and operation provision specifies that the permit expires if construction has not begun within two years of permit issuance or if construction has been suspended for a year in accordance with IDAPA 58.01.01.211.02.

Initial Permit Condition 3.6

The notification of construction and operation provision requires that the permittee notify DEQ of the dates of construction and operation, in accordance with IDAPA 58.01.01.211.03.

Initial Permit Condition 3.7

The performance testing notification of intent provision requires that the permittee notify DEQ at least 15 days prior to any performance test to provide DEQ the option to have an observer present, in accordance with IDAPA 58.01.01.157.03.

Initial Permit Condition 3.8

The performance test protocol provision requires that any performance testing be conducted in accordance with the procedures of IDAPA 58.01.01.157, and encourages the permittee to submit a protocol to DEQ for approval prior to testing.

Initial Permit Condition 3.9

The performance test report provision requires that the permittee report any performance test results to DEQ within 30 days of completion, in accordance with IDAPA 58.01.01.157.04-05.

Initial Permit Condition 3.10

The monitoring and recordkeeping provision requires that the permittee maintain sufficient records to ensure compliance with permit conditions, in accordance with IDAPA 58.01.01.211.

Initial Permit Condition 3.11

The excess emissions provision requires that the permittee follow the procedures required for excess emissions events, in accordance with IDAPA 58.01.01.130-136.

Initial Permit Condition 3.12

The certification provision requires that a responsible official certify all documents submitted to DEQ, in accordance with IDAPA 58.01.01.123.

Initial Permit Condition 3.13

The false statement provision requires that no person make false statements, representations, or certifications, in accordance with IDAPA 58.01.01.125.

Initial Permit Condition 3.14

The tampering provision requires that no person render inaccurate any required monitoring device or method, in accordance with IDAPA 58.01.01.126.

Initial Permit Condition 3.15

The transferability provision specifies that this permit to construct is transferable, in accordance with the procedures of IDAPA 58.01.01.209.06.

Initial Permit Condition 3.16

The severability provision specifies that permit conditions are severable, in accordance with IDAPA 58.01.01.211.

PUBLIC REVIEW

Public Comment Opportunity

An opportunity for public comment period on the application was provided in accordance with IDAPA 58.01.01.209.01.c or IDAPA 58.01.01.404.01.c. During this time, there was a request for a public comment period on DEQ's proposed action. Refer to the chronology for public comment opportunity dates.

Public Comment Period

A public comment period was made available to the public in accordance with IDAPA 58.01.01.209.01.c. During this time, comments **were/were not** submitted in response to DEQ's proposed action. Refer to the chronology for public comment period dates.

A response to public comments document has been crafted by DEQ based on comments submitted during the public comment period. That document is part of the final permit package for this permitting action.

APPENDIX A – EMISSIONS INVENTORIES

APPENDIX B – AMBIENT AIR QUALITY IMPACT ANALYSES

APPENDIX C – FACILITY DRAFT COMMENTS

The following comments were received from the facility on July 10, 2015:

Permit to Construct (PTC)

Facility Comment (1): PTC, Table 1 - For Make-Up Air Unit MAU1, the combustion unit emissions were calculated at the rated flow and 8,760 hours, so there should not be a limit on the volume.

DEQ Response: The requested change will be made to the PTC.

Facility Comment (2): PTC, Table 1 - Roof Top Unit RTU1 should not be listed as a regulated source.

DEQ Response: The requested change will be made to the PTC.

Facility Comment (3): PTC, Table 1 - For Roof Top Unit RTU1, the combustion unit emissions were calculated at the rated flow and 8,760 hours so there should not be a limit on the volume.

DEQ Response: RTU1 was removed per Comment (2) and the requested changes will be made to the PTC.

Facility Comments (4), (6), and (7): PTC, Table 1 - For Roof Top Unit RTU1 and Paint Booths PB1, PB2, PB3, and PB4, the time was calculated on 8,760 hours, so there is no need to limit or mention the hours of operation.

DEQ Response: RTU1 was removed per Comment (2) and the requested changes will be made to the PTC.

Facility Comment (5): PTC, Table 1 – The 2nd spray gun for Paint Booth PB1 should be identified as Model: 3.

DEQ Response: The requested change will be made to the PTC.

Facility Comment (8): PTC, Table 1 - There is no filter/control equipment for Infrared Curing Oven IO1.

DEQ Response: The requested change will be made to the PTC.

Facility Comment (9): PTC, Table 2 - There is no filter/control equipment for Infrared Curing Oven IO1.

DEQ Response: The requested change will be made to the PTC.

Facility Comment (10): PTC, Table 3 – The control efficiency is 99.43% rather than 99.84%, thus the some of the data within Table 3 needs to be revised. In addition, the VOC data was incorrectly listed for the entire facility rather than just for the paint booth operations.

Using the correct number for control efficiency and the data for only the paint room, for Table 3, PM_{10} will be 0.03 lb/hr, instead of 0.05 lb/hr and 0.11 T/yr, instead of 0.22 T/yr. In addition, VOC will be 21.54 lb/hr, instead of 21.57 lb/hr and 94.36 T/yr, instead of 94.49 T/yr.

DEQ Response: The requested changes will be made to the PTC.

Facility Comments (11), (12), (13), and (14): PTC, Page 5, Section 2.7 – The wording was confusing. In addition, the days of operation and daily values were incorrect.

DEQ Response: The wording will be revised to reflect accurate 12 month rolling use rates will be added to the PTC. The requested changes will be made to the PTC.

Facility Comments (15) and (16): PTC, Page 5, Section 2.8 – The control efficiency of the filters should be 99.43%.

DEQ Response: The requested changes will be made to the PTC.

Facility Comments (17) and (18): PTC, Page 6, Section 2.10 – The material purchase records are irrelevant to daily usage; therefore it should be totally removed.

DEQ Response: Purchase records are kept for review, to verify material usage by an inspector being able to compare purchased coating materials versus on-hand coating materials. However, the wording/text will be revised so that purchase records will be kept and maintained in a manner to allow any potential inspector to easily and efficiently verify use. Therefore the requested changes will not be made to the PTC.

Facility Comment (19): PTC, Page 6, Section 2.11 – This section contained repetitive wording/text.

DEQ Response: The requested change will be made to the PTC.

Statement of Basis (SOB)

Facility Comments (1), (2), (3), (5), (6), (7), and (8): SOB, Table 1 – For Make-Up Air Unit MAU1, Roof Top Units RTU1, RTU2, and RTU3, and Unit Heaters UH1, UH2, and UH3, the combustion unit emissions were calculated at the 8,760 hours, so there should not be a limit on the volume or hours of operation.

DEQ Response: The requested changes will be made to the Statement of Basis.

Facility Comment (4): SOB, Table 1 – The incorrect Model ID for Roof Top Unit RTU3 was listed. The correct Model ID should be GPG13 480901AB. In addition, the heat input rating for RTU3 was listed as 0.093 MMBtu/hr and it should be 0.092 MMBtu/hr.

DEQ Response: The requested changes will be made to the Statement of Basis.

Facility Comments (9) and (11): SOB,Table 1 – Since the time amount of paint usage was not modeled, there should be no limit on hours of operation.

DEQ Response: The requested changes will be made to the Statement of Basis.

Facility Comment (10): SOB, Table 1 – The 2nd spray gun for Paint Booth PB1 was incorrectly identified as Model 1.4 and should be identified as Model: 3.

DEQ Response: The requested change will be made to the Statement of Basis.

Facility Comment (12):SOB, Table 1 - There is no filter/control equipment for Infrared Curing Oven IO1.

DEQ Response: The requested change will be made to the Statement of Basis.

Facility Comment (13): SOB, Page 7, Potential to Emit – Emission factors the operation of the facility was incorrectly listed as 1,526 hours and the correct number should be 8,760 hours.

DEQ Response: The requested change will be made to the statement of Basis.

Facility Comment (14): SOB, Page 7, Uncontrolled Potential to Emit – This statement in the second sentence is not correct.

DEQ Response: This statement is for facility classification purposes only and is correct in the context of uncontrolled PTE. The text will be clarified, but the requested change will not be made.

Facility Comment (15): SOB, Page 8 - Worst case (maximum operation) for the operation of the facility was incorrectly listed as 2.496 hours and the correct number should be 8,760 hours.

DEQ Response: The requested change will be made to the Statement of Basis. In addition, the text will be clarified to accurately indicate the correct change in control efficiency.

Facility Comment (16): SOB, Page 9 - It was incorrectly listed that there are 2 unit heaters, when there are actually 3 unit heaters.

DEQ Response: The requested change will be made to the Statement of Basis.

Facility Comment (17): SOB, Page 9 - Worst case (maximum operation) for the operation of the facility was incorrectly listed as 2,496 hours and the correct number should be 8,760 hours.

DEQ Response: The requested change will be made to the Statement of Basis.

Facility Comments (18) SOB, Table 3, (21), SOB, Table 8 and (22), SOB, Table 10 - The total PTE was incorrectly listed as 10.84T/yr and the correct number is 12.1 T/yr.

DEQ Response: The requested changes will be made to the Statement of Basis.

Facility Comment (19) SOB, Table 4 - Based on the correct control efficiency of 99.43%, some of the data within Table 4 was incorrect from when an incorrect control efficiency of 99.84% was used.

DEQ Response: Using the correct number for control efficiency and the data for the paint room, for Table 4, $PM_{2.5}$ and PM_{10} will each be 0.11 T/yr instead of 0.032 T/yr each. In addition, the total for point sources for $PM_{2.5}$ and PM_{10} will each be 0.30 T/yr, instead of 0.22 T/yr.

The requested changes will be made to the Statement of Basis.

Facility Comment (20): SOB, Table 5 - Based on the correct control efficiency of 99.43%, some of the data within Table 5 was incorrect from when an incorrect control efficiency of 99.84% was used.

DEQ Response: Using the correct number for control efficiency and the data for the post-project for potential to emit, for Table 5, $PM_{2.5}$ and PM_{10} will each be 0.11 T/yr instead of 0.22 T/yr each. In addition, the changes in potential to emit for $PM_{2.5}$ and PM_{10} will each be 0.30 T/yr, instead of 0.22 T/yr.

The requested changes will be made to the Statement of Basis.

Facility Comment (23):SOB, Page 17, 40 CFR 63, Subpart MMMM – It should be emphasized that the facility is not a major source.

DEQ Response: The requested change will be made to the Statement of Basis.

Facility Comment (24): SOB, Page 18, 40 CFR 63, Subpart RRRR – It should be emphasized that the facility is not a major source.

DEQ Response: The requested change will be made to the Statement of Basis.

Facility Comment (25): SOB, Page 18, 40 CFR 63, Subpart HHHHHH - The facility does not coat metal or plastic parts with HAP-containing coatings. The only HAP-containing coating is hand wiped onto a wood product.

DEQ Response: The requested change will be made to the Statement of Basis.

Facility Comment (26): SOB, Page 19, 40 CFR 63, Subpart XXXXXX – Clarification is needed to state that the facility does not manufacture products, but only coats them.

DEQ Response: The requested change will be made to the Statement of Basis.

Facility Comment (27): SOB, Page 19, Initial Permit Condition 2.3 – This incorrectly states that the facility is a truck and trailer coating operation and that it should be correctly identified as door, door-frame, and trim coating facility.

DEQ Response: The requested change will be made to the Statement of Basis.

Facility Comment (28): SOB, Page 19, Initial Permit Condition 2.4 – It should be clarified that the facility is a door, door-frame, and trim coating facility.

DEQ Response: The requested change will be made to the Statement of Basis.

Facility Comment (29): SOB Page 19, Initial Permit Condition 2.10 - The material purchase records are irrelevant to daily usage and an undue burden; therefore it should be totally removed.

DEQ Response: As discussed previously, material purchase records are required to verify the coating use at the facility. Therefore the requested change will not be made to the Statement of Basis.

Facility Comment (30): SOB, Page 21, Public Comment Period - No comments were received.

DEQ Response: A public comment period was requested during the public comment opportunity. Therefore, since the public comment period has not occurred yet, it cannot be stated that no comments were received. This will be clarified, but the requested change will not be made.

Facility Comment (31): SOB, Page 21, Public Comment Period - Since no comments were received, DEQ did not provide a response to the public comment(s).

DEQ Response: The public comment period was requested during the public comment opportunity. Therefore, since the public comment period has not occurred yet, it cannot be stated that no comments were received and that DEQ did not provide a response. This will be clarified, but the requested change will not be made.

Statement of Basis, Appendix A – Emissions Inventories

Facility Comment SOB, Appendix A, Table 3.2 - Based on the correct control efficiency of 99.43%, some of the data within Table 3.2 was incorrect from when an incorrect control efficiency of 99.84% was used.

DEQ Response: Using the correct number for control efficiency and the data for the paint room, for Table 3.2 the controlled emission rate for Carbon black is 0/001 lb/hr instead of 0.000 lb/hr. $PM_{2.5}$ and PM_{10} will each be 0.11 T/yr instead of 0.032 T/yr each and 0.03 lb/hr instead of 0.007 lb/hr.

The requested changes will be made to the Statement of Basis, Appendix A – Emission Inventories.

Facility Comment SOB, Appendix A, Table 4-1b - Based on the correct control efficiency of 99.43%, some of the data within Table 4-1b was incorrect from when an incorrect control efficiency of 99.84% was used.

DEQ Response: Using the correct number for control efficiency and the data for the post-project for potential to emit, for Table 5, $PM_{2.5}$ and PM_{10} will each be 0.11 T/yr instead of 0.032 T/yr each. In addition, the changes in potential to emit for $PM_{2.5}$ and PM_{10} will each be 0.30 T/yr, instead of 0.22 T/yr.

The requested changes will be made to the Statement of Basis, Appendix A – Emission Inventories.

Facility Comment SOB, Appendix A, Table 4-1c - Based on the correct control efficiency of 99.43%, some of the data within Table 4-1c was incorrect from when an incorrect control efficiency of 99.84% was used.

DEQ Response: Using the correct number for control efficiency and the data for the post-project for potential to emit, for Table 5, $PM_{2.5}$ and PM_{10} will each be 0.11 T/yr instead of 0.22 T/yr each. In addition, the changes in potential to emit for $PM_{2.5}$ and PM_{10} will each be 0.30 T/yr, instead of 0.22 T/yr.

The requested changes will be made to the Statement of Basis, Appendix A – Emission Inventories.

The following revised and additional comments were received from the facility on July 21, 2015:

Permit to Construct (PTC)

Facility Comment (New Revision 1 [A11]) PTC, Table 3 - Some of the data within Table 3 needs to be revised.

For Table 3, PM_{10} will be 0.12 T/yr, instead of 0.11 T/yr.

DEQ Response: The requested change will be made to the Statement of Basis.

Facility Comment (New Revision 2 [A14 to A21]) PTC, Page 5, Section 2.7 – Coating material daily use limits are established. The maximum annual use of Polane paint, or equivalent, should be 13,140 gallons per year or 36 gallons per day, instead of 13,870 gallons per year. The maximum annual use of Stain/Lacquer, or equivalent, should be 1,460 gallons per year or 4 gallons per day, instead of 1,400 gallons per year.

DEQ Response: The requested changes will be made to the PTC.

Facility Comment (New Addition 1): PTC Pages 5 and 6, Section 2.8 - The facility may need to use a different specific coating not listed in the PTC.

DEQ Response: The requested addition will be added to the PTC.

Facility Comment (New Revision 3): PTC Page 6, Section 2.9 – This permit condition was previously 2.8 and needs to be changed to 2.9.

DEQ Response: The requested revision will be made to the PTC.

Facility Comment (New Revision 4): PTC Page 6, Section 2.10 – This section was previously 2.9 and needs to be changed to 2.10.

DEQ Response: The requested revision will be made to the PTC.

Facility Comments (Revised 17 and 18): PTC Page 6, Section 2.11 (Previously Section 2.10) - The material purchase records are irrelevant to daily usage and an undue burden; therefore it should be totally removed.

DEQ Response: As discussed previously, material purchase records are required to verify the coating use at the facility. Therefore the requested change will not be made to the PTC.

Facility Comment (New Revision 3): PTC Page 6, Section 2.11 – This section was previously 2.10 and needs to be changed to 2.11.

DEQ Response: The requested revision will be made to the PTC.

Facility Comment (New Revision 4): PTC Page 6, Section 2.12 – This permit condition was previously 2.11 and needs to be changed to 2.12.

DEQ Response: The requested revision will be made to the PTC.

Statement of Basis (SOB)

Facility Comment (New Addition 1): SOB Page 19, Initial Permit Condition 2.8 - The facility may need to use a different specific coating not listed in the PTC.

DEQ Response: The requested addition will be added to the Statement of Basis.

Facility Comment (New Revision 1): SOB Page 19, Initial Permit Condition 2.9 – This permit condition was previously 2.8 and needs to be changed to 2.9.

DEQ Response: The requested revision will be made to the Statement of Basis.

Facility Comment (New Revision 2): SOB Page 19, Initial Permit Condition 2.10 – This permit condition was previously 2.9 and needs to be changed to 2.10.

DEQ Response: The requested revision will be made to the Statement of Basis.

Facility Comment (Revised 29): SOB Page 19, Initial Permit Condition 2.11 (Previously Permit Condition 2.10) - The material purchase records are irrelevant to daily usage and an undue burden; therefore it should be totally removed.

DEQ Response: As discussed previously, material purchase records are required to verify the coating use at the facility. Therefore the requested change will not be made to the Statement of Basis

Facility Comment (New Revision 3): SOB Page 19, Initial Permit Condition 2.11 – This permit condition was previously 2.10 and needs to be changed to 2.11.

DEQ Response: The requested revision will be made to the Statement of Basis.

Facility Comment (New Revision 4): SOB Page 19, Initial Permit Condition 2.12 – This permit condition was previously 2.11 and needs to be changed to 2.12.

DEQ Response: The requested revision will be made to the Statement of Basis

Statement of Basis, Appendix A – Emissions Inventories

Facility Comment (New Revision 1): SOB, Appendix A, Table 3.2 - Some of the data within Table 3.2 needed to be revised.

DEQ Response: For Table 3.2, the controlled emission rate for PM_{10} and $PM_{2.5}$ will each be 0.12 T/yr instead of 0.11 T/yr each.

The requested changes will be made to the Statement of Basis, Appendix A – Emission Inventories.

Facility Comment (New Revision 2) SOB, Appendix A, Table 4-1b - Some of the data within Table 4-1b needed to be revised.

DEQ Response: For Table 4-1b, the controlled emission rate for $PM_{2.5}$ and PM_{10} will each be 0.12 T/yr instead of 0.11 T/yr each.

The requested changes will be made to the Statement of Basis, Appendix A – Emission Inventories..

Facility Comment (New Revision) SOB, Appendix A, Table 4-1c - Some of the data within Table 4-1c needed to be revised.

DEQ Response: For Table 4-1c, the controlled emission rate for $PM_{2.5}$ and PM_{10} will each be 0.12 T/yr instead of 0.11 T/yr each.

The requested changes will be made to the Statement of Basis, Appendix A – Emission Inventories.

APPENDIX D – PROCESSING FEE